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CHEMICAL MANUFACTURERS ASSOCIATION

October 25, 1994

Mr. Gary Timm
Environmental Health Scientist
U.S. Environmental Protection Agency   CONTAINS NO CBI
401 M Street
Mailcode 8602
Washington, D.C. 20460

Dear Gary,

The Office of Air Quality Planning and Standards has requested that EPA facilitate the implementation of three TSCA Section 4 Test Rules for generating inhalation animal toxicity data on Hazardous Air Pollutants (HAPS) for use in conducting residual risk analyses.

CMA wishes to offer EPA a list of some of the issues we believe would most benefit from an early dialogue process. Since the HAPS rulemaking will be technically complicated and because we expect the comment period to be approximately 90 days, a dialogue should begin as soon as possible. An early discussion of how best to structure this rulemaking will also be extremely beneficial. An example of this is developing the most effective schedule for public meetings on this proposed rule. Consideration of these issues at an early stage will provide an excellent opportunity for both EPA and industry representatives to benefit from the experience gained in the recent neurotoxicity test rule implementation.

The following is a preliminary list of issues CMA believes would most benefit from an early dialogue with EPA:

◊   Schedule for development and public release of new proposed test guidelines;
◊   Criteria for dose selection;
◊   Criteria for determining laboratory resources;
◊   Criteria for Clean Air Act residual risk determination (i.e., how data will be used by the Agency to determine residual risk);
◊   Discussion of EPA's evaluation of exposure to HAPS;
◊   Rationale for acute testing battery;
◊   Availability of EPA technical background documents.

CMA requests a meeting with appropriate representatives from EPA and the chemical industry to address these generic issues. Please contact me at (202) 887-6920 at your earliest convenience to discuss meeting arrangements. I look forward to meeting with you in the near future.

Sincerely,

Sarah Doelp
Manager
Product Stewardship

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